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October 28, 2020

VIA ECF

Hon. Zahid N. Quraishi, U.S.M.J. Clarkson S. Fisher Federal Building and U.S. Courthouse 402 E. State Street Trenton, New Jersey 08608

Re: UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.

Civil Action No. 19-17272 (MAS) (ZNQ)

Dear Judge Quraishi:

This firm, along with our co-counsel Jenner & Block LLP and Stein Mitchell Beato & Missner LLP, represents Plaintiffs/Counterclaim Defendants and Counterclaim Defendant Recording Industry Association of America, Inc. in the referenced matter. The parties have reached agreement with non-party TPG Capital on the terms of a Stipulated Supplemental Protective Order, in the form attached hereto, applicable to the production of certain confidential information by TPG. In accordance with Local Civil Rule 5.3(b), we hereby jointly request the entry of this Order. We greatly appreciate the Court's consideration of this request.

Respectfully yours,

McElroy, Deutsch, Mulvaney & Carpenter, LLP

GEORGE C. JONES

Attachment

cc: All counsel of record (via ECF and e-mail)

Kevin J. Post, Esq. (via e-mail) Cassandra B. Roth, Esq. (via e-mail)